

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ATLANTIC CASUALTY INSURANCE)
COMPANY,)

Plaintiff,)

v.)

JOHN'S ROOFING AND)
CONSTRUCTION, INC., and STATE)
FARM FIRE AND CASUALTY)
COMPANY, as Subrogee of)
RUTH WYATT,)

Defendants.)

NO: 1:11-cv-09091

Honorable Gary Feinermen

**MOTION FOR ENTRY OF
AGREED JUDGMENT**

NOW COMES the Plaintiff, ATLANTIC CASUALTY INSURANCE COMPANY, by its Attorneys, CARLSON LAW OFFICES, and request that the court enter the proposed judgment agreed to in this case, stating as follows:

1. Previously, Defendant STATE FARM FIRE & CASUALTY COMPANY ("STATE FARM"), entered into a stipulation to be bound by any judgment in the case between ATLANTIC CASUALTY and JOHN'S ROOFING & CONSTRUCTION, INC. ("JOHN'S ROOFING"). See Docket Entry No. 13.
2. Subsequently, Plaintiff ATLANTIC CASUALTY and DEFENDANT JOHN'S ROOFING & CONSTRUCTION entered into a stipulation that ATLANTIC CASUALTY had no duty to defend or indemnify JOHN'S ROOFING & CONSTRUCTION COMPANY in the underlying litigation filed by STATE FARM against JOHN'S ROOFING, Cook County Case No. 11 L 8472.
3. As a result, Plaintiff requests that the agreed judgment attached to the Stipulation, approved by the two remaining parties be entered, which enters judgment that there is no duty to defend or indemnify owed by Atlantic Casualty to JOHN'S ROOFING in

connection with the STATE FARM lawsuit, and that each party shall bear its own attorney fees and costs, terminating this litigation.

Respectfully submitted,

/s/ Keith G. Carlson

Keith G. Carlson, One of the Attorneys for
Plaintiff, ATLANTIC CASUALTY
INSURANCE COMPANY

Keith G. Carlson
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CERTIFICATE OF SERVICE

Keith G. Carlson, an Attorney at law, certifies that on the 4th day of September, 2012, he electronically filed **MOTION FOR ENTRY OF AGREED JUDGMENT** to be served upon all counsel of record by CM/ECF transmission.

/s/ Keith G. Carlson

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